

Exhibit C  
Deposition of Loretta Hollings

1 Q. And can you describe your knowledge of that  
2 work.

3 A. I know that he was basically involved in  
4 marketing it or promoting it and that's about it.

5 Q. Okay. Do you know if he earned any income from  
6 those efforts?

7 A. Yes, he did.

8 Q. Did you ever see any invoices that he might have  
9 issued for his work on that?

10 A. No, I did not.

11 Q. Did you ever see any checks that he might have  
12 received in payment for work for The Secret?

13 A. No, I did not.

14 Q. Did you ever deposit any checks that might have  
15 come in for his work on The Secret?

16 A. No.

17 Q. I'm going to ask this pretty general, so if you  
18 can answer it, great; if not, I'll rephrase. But who  
19 generally handles the financial matters between you and  
20 your husband?

21 A. My husband. He does.

22 Q. Do you ever make deposits into bank accounts?

23 A. Only into my account.

24 Q. And what account is that?

25 A. It has my name on it, Loretta Hollings. I have

47:23 1 before that, we lived in Jacksonville, Florida, and we  
47:27 2 were there for, oh, about a year and a half. Not that  
47:31 3 long. And before that, we lived in Mobile, Alabama for  
47:38 4 probably about five, five and a half years.

47:56 5 Q. At the end of the year, do you file joint tax  
48:00 6 returns or individual, do you know?

48:03 7 A. Jointly.

48:15 8 Q. And the income that would be listed on those tax  
48:20 9 returns, generally the majority of it would be from  
48:24 10 Mr. Hollings' work; is that correct?

48:25 11 A. That is correct.

48:27 12 Q. Can you make a guess as to what percentage of  
48:35 13 income listed on those tax returns would be due to  
48:39 14 Mr. Hollings' earnings?

48:42 15 A. Probably 99 percent.

48:43 16 Q. Okay. Are you familiar with a company called  
49:05 17 Web Services LLC?

49:07 18 A. Yes. I understand that's his business account.

49:12 19 Q. Okay. And are you -- your husband is the  
49:23 20 managing member of that company. Are you a member of that  
49:25 21 company?

49:26 22 A. No.

49:28 23 Q. Are you a director?

49:30 24 A. No.

49:32 25 Q. Have you ever been an employee of that company?

1 A. No, I have not.

2 Q. Okay. When was the last time you visited  
3 Illinois, Mrs. Hollings?

4 A. When we were in Jacksonville, Florida. So that  
5 would have been about nine, nine and a half years ago.

6 Q. Do you recall what took you there on that  
7 occasion?

8 A. My husband had a business trip and I visited  
9 some relatives there while he was there.

10 MR. CEDILLO: I think I have no further  
11 questions.

12 MR. PARKER: Okay. Read and sign.

13 (Deposition proceedings concluded at 1:51 p.m.)  
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16 LORETTA HOLLINGS  
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